

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

RICHARD HUBBARD, III, et al.,)	CASE NO.: 1:18-CV-02252
)	
Plaintiffs,)	JUDGE DAN AARON POLSTER
vs.)	
)	<u>PLAINTIFFS INITIAL DISCLOSURES</u>
CITY OF EUCLID, et al.,)	
)	
Defendants.)	
)	
)	

Now come Plaintiffs, Richard Hubbard III, and Yolimar Tirado, by and through the undersigned counsel, Christopher McNeal, and hereby submit their Initial Disclosures pursuant to Civil Rule 26 and the Court's Orders.

I. INDIVIDUALS-RULE 26(A)(1)(A)(1)

The Plaintiffs Identify the following individuals as likely to have discoverable information that may be used to support their claims.

1. Richard Hubbard III- Plaintiff with knowledge of the facts and circumstances surrounding the basis of the Complaint; may be contacted through counsel.
2. Yolimar Tirado- Plaintiff with knowledge of the facts and circumstances surrounding the basis of the Complaint; may be contacted through counsel.
3. Lashonda Malone- Witness with knowledge of the facts and circumstances surrounding the basis of the Complaint; may be contacted through counsel.

II. DOCUMENTS AND THINGS-RULE 26(A)(1)(A)(II)

1. Medical records relating to injuries suffered by Plaintiff Richard Hubbard III.
2. Photographs of injuries suffered by Plaintiff Richard Hubbard III
3. Dash camera videos depicting the incident at bar.
4. Plaintiffs reserve the right to supplement this response if additional documents and things are identified by discovery or otherwise.

III. DAMAGES – RULE 26(A)(1)(A)(IV)

Damages are not currently fixed as Plaintiffs are still receiving treatment for their injuries.

IV. INSURANCE – RULE 26(A)(1)(A)(IV)

1. Plaintiff Yolimar Tirado has health insurance through CareSource.

2. Plaintiff Richard Hubbard III possesses no health insurance coverage, but receives subsidized health care through the MetroHealth Rating Service.

Respectfully Submitted,

/s/ Christopher McNeal

CHRISTOPHER MCNEAL, (0096363)

MCNEAL LEGAL SERVICES, LLC.

5333 Northfield Road, Suite 300

Bedford Heights, Ohio 44146

(440) 703-0257

chris@mcneallegalservices.com

CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, December 18, 2018, a copy of the foregoing Initial disclosures was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Christopher McNeal

CHRISTOPHER MCNEAL (0096363)
MCNEAL LEGAL SERVICES, LLC

Counsel for Plaintiffs Richard Hubbard and Yolimar
Tirado